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8 Attorney for Plaintiff, JOSHUA ASSIFF

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 **JOSHUA ASSIFF,**

12 **Plaintiff,**

13 **v.**

14 **COUNTY OF LOS ANGELES;**
15 **SHERIFF DEPUTY BADGE**
16 **NUMBER 404532;**
17 **And DOES 1 through 10,**

18 **Defendants.**

Case No. 2:22-cv-05367 RGK (MAAx)

**NOTICE OF DEPOSITION OF
DEFENDANT COUNTY OF LOS
ANGELES**

DATE: April 26, 2023

TIME: 10:00 a.m.

PLACE: 25201 Paseo de Alicia, STE
270, Laguna Hills, CA 92653

19
20 TO ALL PARTIES IN THIS ACTION AND TO THEIR RESPECTIVE
21 ATTORNEYS OF RECORD:

22 PLEASE TAKE NOTICE THAT pursuant to the agreement of the parties,
23 Plaintiff, JOSHUA ASSIF (hereinafter "Plaintiff") will take the deposition of
24 Defendant COUNTY OF LOS ANGELES on April 26, 2023 at the Law Office of
25 Thomas M. Ferlauto, APC., 25201 Paseo de Alicia, Suite 270, Laguna Hills, CA
26 92653 starting at 10:00 a.m. and continuing day to day (Saturdays, Sundays and
27 holidays excepted) until completed.
28

1 The deponent COUNTY OF LOS ANGELES, who is not a natural person, is
2 hereby requested and required, pursuant to FRCP 30(b)(6), to designate and produce
3 a person or persons to testify on behalf of COUNTY OF LOS ANGELES on the
4 following matters:

5 1. The traffic stop policies and procedures for the Los Angeles County
6 Sheriff's Department in effect on September 24, 2021.

7 2. The de-escalation policies and procedures for the Los Angeles County
8 Sheriff's Department in effect on September 24, 2021.

9 3. The use of force policies and procedures for the Los Angeles County
10 Sheriff's Department in effect on September 24, 2021.

11 4. The education and training of Defendant Kelly in the traffic stop policies
12 and procedures for the Los Angeles County Sheriff's Department in effect on
13 September 24, 2021.

14 5. The education and training of Defendant Kelly in the de-escalation
15 policies and procedures for the Los Angeles County Sheriff's Department in effect
16 on September 24, 2021.

17 6. The education and training of Defendant Kelly in the use of force
18 policies and procedures for the Los Angeles County Sheriff's Department in effect
19 on September 24, 2021.

20 7. The supervision of Defendant Kelly on September 24, 2021.

21 8. The investigation into Defendant Kelly's conduct in the incident that is
22 the subject matter of this litigation and that took place on September 24, 2021.

23 9. The efforts by the County of Los Angeles and the Los Angeles Sheriff's
24 Department to comply with the Settlement Agreement entered in USDC Case No.
25 CV-15-03174.

26
27 Said deposition will be taken upon oral examination and shall be conducted
28 before a certified shorthand reporter authorized by FRCP 28 to conduct such

1 depositions. The deposition will be recorded by audio, audiovisual, or stenographic
2 means, as permitted by FRCP 30(b)(3).

3 The deposition will be conducted in the English language. If an interpreter is
4 required noticing party must be notified of the language and/or dialect at least 48
5 hours prior to the commencement of the deposition.

6
7 DATED: March 31, 2023

Law Office of Thomas M. Ferlauto, APC

8
9 By: _____



10 Thomas M. Ferlauto
11 Attorney For: Plaintiff,
12 JOSHUA ASSIFF
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 25201 Paseo de Alicia, Suite 270, Laguna Hills, CA 92653. On March 31, 2023, I served the foregoing document(s) described as:

NOTICE OF DEPOSITION OF DEFENDANT KELLY
NOTICE OF DEPOSITION OF DEFENDANT COUNTY OF LOS ANGELES

[X] ELECTRONIC MAIL: The foregoing document was served electronically without any errors noted at the email addresses stated below:

PATRICK E. STOCKALPER
MOLSHREE GUPTA
KJAR, MCKENNA & STOCKALPER, LLP
841 Apollo Street, Suite 100
El Segundo, California 90245
Telephone (424) 217-3026
Facsimile (424) 367-0400
pstockalper@kmslegal.com
mgupta@kmslegal.com

[X] BY MAIL AS FOLLOWS: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice the above described envelope(s) would be deposited with the US Postal Service on that same day with postage thereon fully prepaid at Laguna Hills, California in the ordinary course of business.

Executed on March 31, 2023, at Irvine, California. I declare under penalty of perjury under the laws of the United States of America and the State of California that the above is true and correct.



Thomas M. Ferlauto